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8

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11

12 **MARCO ANTONIO CARRALERO,**
13 **ET AL.;**

14 Plaintiffs,

15 v.

16 **ROB BONTA, IN HIS OFFICIAL**
17 **CAPACITY AS ATTORNEY GENERAL OF**
18 **CALIFORNIA,**

19 Defendant.
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8:23-cv-01798- MRA-ADS

**SECOND STIPULATION TO
EXTEND DEFENDANT'S TIME TO
RESPOND TO COMPLAINT**

Courtroom: 10B
Judge: Hon. Mónica Ramírez Almadani
Action Filed: September 26, 2023

1 Plaintiffs Marco Antonio Carralero, Garrison Ham, Michael Schwartz,
2 Orange County Gun Owners PAC, San Diego County Gun Owners PAC, California
3 Gun Rights Foundation, and Firearms Policy Coalition, Inc. (collectively,
4 Plaintiffs) and Defendant Rob Bonta in his official capacity as Attorney General of
5 California (Defendant, and together with Plaintiffs, the Parties) hereby stipulate and
6 agree as follows:

7 **WHEREAS**, on September 26, 2023, Plaintiffs filed their Complaint (Dkt. 1)
8 in this matter;

9 **WHEREAS**, on September 26, 2023, Plaintiffs filed their Motion for
10 Preliminary Injunction (Dkt. 6);

11 **WHEREAS**, on October 11, 2023, the Court entered Parties' stipulation to
12 extend Defendant's time to answer or otherwise respond to the Complaint until 21
13 days after the Court ruled on Plaintiffs' Motion for Preliminary Injunction (Dkt.
14 18);

15 **WHEREAS**, on December 20, 2023, the Court issued its Order and
16 Preliminary Injunction (Dkts. 41-42);

17 **WHEREAS**, on December 22, 2023, Defendant filed its notice of appeal
18 appealing the Order and Preliminary Injunction (Dkt. 43);

19 **WHEREAS**, the Court entered the Parties' stipulation to extend Defendant's
20 time to answer or otherwise respond to the Complaint until 21 days after the Ninth
21 Circuit's resolution of Defendant's appeal of the Court's Order and Preliminary
22 Injunction (Dkt. 52);

23 **WHEREAS**, on January 23, 2025, the Ninth Circuit issued its mandate in
24 Defendant's appeal of the Court's Order and Preliminary, and thus Defendant's
25 deadline to respond to the Complaint is now February 13, 2025 (Dkt. 59);

26 **WHEREAS**, good cause exists for this extension because (a) this case
27 presents a constitutional challenge to numerous provisions of California Penal Code
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1 26230(a), and (b) lead counsel for Defendant, Robert L. Meyerhoff, recently
2 returned from parental leave on January 24, 2025;

3 **WHEREAS**, the Parties agree to extend Defendant's deadline to answer or
4 otherwise respond to the Complaint to March 6, 2025;

5 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the
6 Parties that, with the Court's permission:

- 7 • Defendant's deadline to answer or otherwise respond to the Complaint is
8 extended until March 6, 2025.

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10 Dated: February 5, 2025

Respectfully submitted,

11 ROB BONTA
12 Attorney General of California
13 R. MATTHEW WISE
14 Supervising Deputy Attorney General

15 /s/ Robert L. Meyerhoff
16 ROBERT L. MEYERHOFF
17 Deputy Attorney General

*Attorneys for Rob Bonta in his official
capacity as Attorney General for the
State of California*

18
19 Dated: February 5, 2025

Respectfully submitted,

20 BRADLEY A. BENBROOK
21 STEPHEN M. DUVERNAY

22 /s/ Stephen M. Duvernay
23 Benbrook Law Group, P.C.

24 *Attorneys for Plaintiffs Marco Antonio
25 Carralero, Garrison Ham, Michael
26 Schwartz, Orange County Gun
27 Owners PAC, San Diego County Gun
28 Owners PAC, California Gun Rights
Foundation, and Firearms Policy
Coalition, Inc.*